

IN THE UNITED STATES BANKRUPTCY COURT FOR THE
NORTHERN DISTRICT OF TEXAS
WICHITA FALLS DIVISION

IN THE MATTER OF:

CASE NO. 13-70406

BRANDON PAUL KIRKLAND
AND KRISTIN ANNE PYLES

DEBTORS

CHAPTER 13

OBJECTION TO CONFIRMATION OF CHAPTER 13 PLAN

TO THE HONORABLE BANKRUPTCY JUDGE:

NOW COMES County of Wilbarger, hereinafter referred to as Claimant, and files its Objection to the Confirmation of Chapter 13 plan, on the following grounds:

1. The claim of this Claimant (*County of Wilbarger \$1,329.89*) is not included in the Plan. To the extent the Debtor would choose to modify the Plan to pay the claim over time, this Claimant will not accept anything less than the statutory 12% interest rate (11 U.S.C. § 506(b)).

This claim arises from property taxes due for the tax years 2013 on the debtor's property described as real property located in this tax jurisdiction.

WHEREFORE, County of Wilbarger objects to confirmation of the Plan due to noncompliance with the provisions of § 1129(b)(1) and (2)(A) of the Bankruptcy Code, and further requests other and such relief as is just and proper.

Dated: November 21, 2013

Respectfully submitted,

MCCREARY, VESELKA, BRAGG & ALLEN, P.C.
Attorneys for Claimant, County of Wilbarger

/s/Lee Gordon

Lee Gordon

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CERTIFICATE OF SERVICE

I hereby certify that I have placed a copy of the above Objection to Confirmation of Chapter 13 Plan to Monte J. White, Monte J. White & Associates, P.C., 1106 Brook Avenue Hamilton Place, Wichita Falls, Texas 76301; Walter O'Cheskey, P.O. Box 6141, Lubbock, Texas 79493-6141, and to those parties listed on the Court's Notice of Electronic Filing on November 21, 2013, by Electronic Notification.

/s/Lee Gordon

Lee Gordon